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October 27, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, DC 20554

Re: Ex Parte Notification
ET Docket No. 98-153
Ultra-Wideband

Dear Ms. Salas:

On October 26, 1999, Ralph Petroff, President and Chairman of Time Domain Corporation, Alan Petroff, Senior Vice President for Engineering of Time Domain, Rachel Reinhardt, an engineer with Time Domain and I met with Julius Knapp, Chief of the Policy and Rules Division of the Office of Engineering and Technology, Karen Rackley, Chief of the Technical Rules Branch, John Reed, and Rodney Conway of the Branch. We were also joined for a portion of the meeting by Fred Thomas of OET, the FCC's liaison to with the Interdepartmental Radio Advisory Committee.

Our discussions covered the status of the Commission's *Inquiry* into ultra-wideband ("UWB") and the possibility of a rule making. We urged the Commission to move soon to issue a notice of proposed rule making and to support joint testing of UWB technologies with other systems, including GPS, that now operate in the spectrum in which UWB emissions could fall. With regard to the conduct of tests, we noted Time Domain's preference for having the testing conducted by an independent laboratory such as the Institute of Telecommunications Sciences. At the same time, we also urged the OET staff to work toward presenting to the Commission a notice of proposed rule making that could be issued near the beginning of the testing effort with the results of the testing to be commented upon during the course of the rule making. In any such rule making we urged that consideration be given to the adoption of regulations that would focus on the indoor use of UWB technology as a separate category given the radio frequency attenuation characteristics of structures. In discussing the subject of filters, we noted that multiple filters were especially pernicious with respect to UWB systems. On the subject of measurement techniques, we discussed the effect of direct and indirect signals on measurement

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results. We also noted that we had briefed many members of the Interdepartmental Radio Advisory Committee on UWB.

Should any questions arise concerning this matter, please contact me.

Respectfully,

/s/ David E. Hilliard

David E. Hilliard
Counsel for Time Domain Corporation

cc: Messrs. Knapp, Reed, Thomas, and Conway
Ms. Rackley